

REMARKS

It is respectfully submitted that neither Phillips or Leibu teach singularly or in combination what was originally set forth, for example, in claim 1. For example, while Phillips teaches a host controller interface, he shows a serial connection between his host controller interface and his link manager. Thus, it is not seen how the host controller interface could handle one set of functions, as set forth in claim 1, and the link manager would handle another set of functions, as set forth in claim 1. The same can be said for the link controller in Phillips.

Likewise, Leibu teaches the serial arrangement of host controller interface firmware and link manager firmware, for example, in Figures 3 and 4.

However, claim 1 has been amended to call for handling the system-wide state of the wireless device through a host controller interface firmware "coupled directly to a baseband controller" and handling the state of each link through the link manager firmware, also coupled directly to the baseband controller. As shown in Figure 1 of the present application, each of the HCI firmware 22 and link manager firmware 20 are connected independently and directly to the baseband controller 18 so that each, under different circumstances, can control the baseband controller. This is not possible with the arrangement shown in either of the cited references.

Therefore, reconsideration of the rejection of claim 1 is respectfully requested.

Claim 6 has been amended to call for, "once a connection is established" to handle the state of each link with each device through the link manager firmware. See the specification at page 5, lines 8-15. Thus, the system-wide state of the devices handled through the host controller interface firmware and, after connection is established, the state of each link is handled through the link manager firmware. This does not appear to be possible in either of the cited references and neither reference suggests any such thing.

The Leibu reference is virtually silent on what the link manager firmware, section 42 or link manager 58 does. There is simply no explanation at all and no basis to presume, given the architecture of Leibu, that he does what is claimed.

Likewise, nothing in Phillips suggests doing what is claimed and Phillips, like Leibu, suggests a serial architecture which would seem to make meeting the limitations of claim 6 rather difficult.

Claim 11 should be reconsidered for the same reason as claim 1.

Respectfully submitted,



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